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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,  
v.

AKRUM ALRAHIB,

Defendant.

Case No.: 2:21-CR-185 WBS

**STIPULATION FOR THE DEPOSIT OF FUNDS  
INTO THE COURT'S DEPOSIT FUND; AND  
ORDER THEREON**

[No Hearing Requested]

Plaintiff United States of America and defendant Akrum Alrahib ("Defendant"), through their respective counsel (together, the "Parties"), hereby seek an order directing the Clerk of Court to deposit Defendant's previously made \$250,000 payment into the Court's Deposit Fund pending the outcome of this criminal prosecution.

The Parties stipulate and agree as follows:

1. The Information in this case charges Defendant with violations of Title 18, United States Code, Section 371—Conspiracy to Commit Mail Fraud ("Count Ones and Two"). Defendant entered a guilty plea to Count One pursuant to the Parties' plea agreement filed on October 13, 2021 (ECF No. 4). According to the plea agreement, Defendant is subject to a special assessment, a possible fine, and restitution in an amount of \$10,039,126.00.

2. The Court entered Defendant's guilty plea and adjudged him guilty following his change

1 of plea hearing. ECF No. 18. A status hearing regarding sentencing is currently set for December 13,  
2 2021. *Id.*

3 3. On or about November 24, 2021, Defendant delivered \$250,000.00 in pre-judgment  
4 restitution, which has been paid to the Clerk of the Court. The Parties seek an order from the Court  
5 approving this stipulation and the deposit of those funds in an account maintained by the Clerk of the  
6 Court until the Court imposes judgment and orders restitution.

7 4. Based on the foregoing, the Parties agree the Court can and should enter an order  
8 directing the Clerk of Court to deposit Defendant's \$250,000.00 payment into the Court's Deposit Fund  
9 and to apply those funds to the special assessment and restitution the Court orders in the case.

10 Respectfully submitted,

11 FOR THE UNITED STATES:

PHILLIP A. TALBERT  
Acting United States Attorney

12  
13 Dated: November 29, 2021

14 By: /s/ Rosanne Rust  
15 ROSANNE L. RUST  
16 MICHAEL D. ANDERSON  
Assistant United States Attorneys

17 FOR DEFENDANT AKRUM ALRAHIB:

18  
19 Dated: November 29, 2021

By: /s/ Akrum Alrahib  
20 AKRUM ALRAHIB

21 APPROVED AS TO FORM AND CONTENT:

22  
23  
24 Dated: November 29, 2021

By: /s/ William Portanova  
25 WILLIAM PORTANOVA  
26 Counsel for Akrum Alrahib  
27  
28

**ORDER**

The Court, having reviewed the court files and the Parties' Stipulation for the Deposit of Funds into the Court's Deposit Fund (the Stipulation), and good cause appearing therefrom, hereby APPROVES the Stipulation. Accordingly, IT IS ORDERED that:

1. The Clerk of Court is directed to deposit defendant Akrum Alrahib's previous \$250,000 payment into the Court's Deposit Fund (the Fund) and to apply those funds to the special assessment and restitution the Court orders at sentencing; and

2. Defendant's prejudgment payment shall remain in the Fund pending adjudication of this case. Upon sentencing, the Clerk of Court shall apply the payment towards the special assessment and restitution ordered in the case. If the Court orders restitution in an amount less than Defendant's prejudgment payment, the Clerk of Court shall return the surplus to the Defendant within thirty days following entry of judgment.

IT IS SO ORDERED.

Dated: November 30, 2021



**WILLIAM B. SHUBB**  
**UNITED STATES DISTRICT JUDGE**